

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

KATHERINE GODFREY, GAIL MORRIS,  
TAMALA WATKINS, EVELYN DAVIS,  
MONICA DENTLEY, and CARLA LLOYD,  
individually and on behalf of all others similarly  
situated; and KIMBERLY BAILEY, MILDRED  
BROWN, LYNETTE COLLINS, LONETTA  
CURTIS, LAURA HENRY, LYNETTE MOORE,  
ERICA D. SANDERS, GWEN STEVENSON,  
YOLANDA WEBB, SHEILA WILLIAMS,  
DANITA WILLIAMS, and LETREONA  
WOODS, individually;

*Plaintiffs,*

v.

THE CITY OF CHICAGO, a municipal  
corporation;

*Defendant.*

Case No. 12 C 8601

Judge Sara L. Ellis

Magistrate Judge Maria Valdez

**RESPONSE TO PLAINTIFFS' MOTION  
TO EXTEND TIME FOR FACT AND EXPERT DISCOVERY**

The City of Chicago (the "City"), by its undersigned attorneys, responds as follows to Plaintiffs' Motion to Extend Time for Fact and Expert Discovery (ECF No. 140):

1. On May 2, 2014, the Court set the following schedule for fact and expert discovery in the instant case:

<b>Fact Discovery Ordered Closed by:</b>	<b>October 3, 2014</b>
<b>Expert Discovery Ordered Closed by:</b>	<b>January 30, 2015</b>

*See* Min. Order, ECF No. 95 (entered May 2, 2014).

2. The City has no objection to: (1) Plaintiffs' request to extend fact discovery through January 30, 2015; or (2) Plaintiffs' request to vacate the current deadline for expert

discovery. However, while the parties have the Court's attention, the City suggests that rather than simply vacating the deadline for expert discovery without further action, the Court should take this opportunity to create a comprehensive schedule informing each party as to the remaining deadlines in the case.

3. The City previously suggested a revised schedule for expert discovery and the submission of expert reports, which appeared in the precursor to the motion filed by Plaintiffs. Indeed, Plaintiffs' motion was originally written by the City, and was first proposed as a "Joint" motion for Plaintiffs' review on September 5, 2014. Although the City requested comments and revisions to the proposed "Joint" motion, Plaintiffs provided neither. Instead, they altered the City's motion – which had been provided in "Word" format – and filed the current submission, omitting any reference to the proposed schedule for expert discovery.

4. Because the parties will need their experts to consider any materials produced during fact discovery, and because it makes little sense for the Court to address scheduling issues in multiple filings, the City respectfully requests the Court to set the following schedule for fact discovery and expert discovery in the instant case:

<b>Fact Discovery Ordered Closed by:</b>	<b>January 30, 2015</b>
<b>Plaintiffs to Serve Expert Reports:</b>	<b>February 27, 2015</b>
<b>Defendants to Serve Expert Reports:</b>	<b>March 27, 2015</b>
<b>Plaintiffs to Serve Rebuttal Expert Reports:</b>	<b>April 24, 2015</b>
<b>Defendants to Serve Rebuttal Expert Reports:</b>	<b>May 22, 2015</b>
<b>Expert Discovery Ordered Closed by:</b>	<b>May 22, 2015</b>

5. The revised deadlines set forth above are not requested for any improper purpose and will allow the parties to complete both fact and expert discovery in a timely manner.

6. The schedule set forth above does not significantly extend or augment the length of time for expert discovery that was initially directed by the Court on May 2, 2014. *See* Min. Order, ECF No. 95 (entered May 2, 2014).

WHEREFORE, the City requests the Court to grant Plaintiffs' Motion to Extend Time for Fact and Expert Discovery, and to concurrently revise the schedule for expert discovery in accordance with the schedule set forth above.

Dated: September 8, 2014

Respectfully submitted,

**THE CITY OF CHICAGO**

By: s/ Brian Weinthal  
One of Its Attorneys

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